CUE 04-0031

OMB Control # 2060-0482

For EPA Use Only ID # _____

SECTOR _____

Worksheet 5. Application Summary

This worksheet will be posted on the web to notify the public of requests for critical use exemptions beyond the 2005 phase out for methyl bromide. Therefore, this worksheet cannot be claimed as CBI.

1. **Consortium Name:** North American Millers' Association
2. **Location:** Washington, DC
3. **Crop:** Not applicable
4. **Pounds of Methyl Bromide Requested** 2007 700,000 lbs.
5. **Volume Treated with Methyl Bromide** 2007 580 (million cu ft)
6. **If methyl bromide is requested for additional years, reason for request:**

As noted on worksheet 4, US grain mills will continue to transition away from methyl bromide as they are able to. In the years covered by the CUE, incremental gains in adopting alternatives will become more and more difficult to achieve, leaving those mills for which technically and economically viable alternatives do not exist.

2006	725,000	lbs.	Volume Treated	580	(million cu ft)
2007	700,000	lbs.	Volume Treated	560	(million cu ft)
2008	675,000	lbs.	Volume Treated	540	(million cu ft)

Place an "X" in the column(s) labeled "Not Technically Feasible" and/or "Not Economically Feasible" where appropriate. Use the "Reasons" column to describe why the potential alternative is not feasible.

Potential Alternatives	Not Technically Feasible	Not Economically Feasible	Reasons
pheromones	X		Pheromones have no ability to control insects. They are merely sex attactants, useful only as a partial indicator of insect presence for a limited number and development stages of selected species.
Integrated pest management, pest exclusion and physical removal, cleaning and sanitation	X		While each of these is already in common use industry-wide, they are insufficient to prevent or treat infestation by themselves.
phosphine	X	X	Not recommended in food processing areas due to potential for damage to electronic equipment. Field experiences show some control failures. Emerging hypothesis of insects developing resistance. Used in combination with carbon dioxide releases greenhouse gases.
sulfuryl fluoride	X	X	Not approved in the US for use on enrichment or ingredients, precluding its use in food manufacturing facilities where these components are present. At this writing, not approved in California, the leading state in grain milling in the US. Not approved in export markets (with 2 exceptions). Reduced lethality on certain life stages, esp. eggs, requires CT (concentration x time) of 2-3X more than methyl bromide. Use is very temperature dependent - in the same location the cost can double just for a temperature reduction from 85 F to 75 F.
heat	X	X	The application of high heat is very costly as few mills are equipped with sufficient heat generation capacity. They must contract with outside suppliers of heat generators. Milling equipment manufacturers do not guarantee their equipment to be able to withstand the high heat environment. Requires extraordinary amount of heating process management to control heating, prevent hotspots, modify the facility fire suppression sprinkler system and prevent structural damage and operational failures. Can cost 2 -3 times existing methyl bromide cost. - Some buildings may not be able to withstand heating at all times of the year when needed due to potential structural damage. For example: heating concrete walls may result in damage if the delta T exceeds 70 F. Reason: Concrete walls expand toward the heated side. If they are also tied into the structural steel for floors, and the outside is cold, then the walls will expand toward the interior steel beams, which are expanding outward. Net result is excessive pressure resulting in wall damage and potentially dangerous structural failure. As a result, heat treatment of these types of facilities is only possible in the warmest summer months.